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11 Federal Trade Commission

12 UNITED STATES DISTRICT COURT  
13 DISTRICT OF NEVADA

14 FEDERAL TRADE COMMISSION,

15 Plaintiff,

16 v.

17 PUBLISHERS BUSINESS SERVICES,  
18 INC., et al.,

19 Defendants.

Case No. 2:08-cv-00620-APG-GWF

FOURTH STIPULATED REQUEST  
FOR EXTENSION OF TIME TO  
COMPLY WITH AUGUST 5, 2021  
ORDER ON MANDATE;  
[PROPOSED] ORDER THEREON

20 Plaintiff Federal Trade Commission (“FTC”) and Defendants Publishers  
21 Business Services, Inc., Ed Dantuma Enterprises, Inc., Dirk Dantuma, Dries  
22 Dantuma, Jeffrey Dantuma, and Brenda Dantuma Schang (“Defendants”)  
23 respectfully stipulate and request that the Court extend the deadline for the parties  
24 to comply with the Court’s August 5, 2021 Order (docket #344) from March 8,  
25 2022 to June 7, 2022. This is the parties’ fourth requested extension of time.

26 On June 10, 2021, the Ninth Circuit issued a judgment affirming in part,  
27 vacating in part, and remanding the Judgment of this Court in the above-captioned  
28 action. On August 5, 2021, this Court entered an Order (docket #344) consistent  
with the Ninth Circuit’s mandate and ordering the parties, Plaintiff Federal Trade

1 Commission and Defendants Publishers Business Services, Inc., Ed Dantuma  
2 Enterprises, Inc., Dirk Dantuma, Dries Dantuma, Jeff Dantuma, and Brenda  
3 Dantuma Schang, to confer about a Stipulated Judgment resolving this case. The  
4 Order required the parties to file, by August 31, 2021, an appropriate stipulation, or  
5 if they cannot agree, joint or separate briefs explaining the areas of disagreement  
6 and a proposed briefing schedule on all remaining issues. On August 26, 2021, the  
7 Court granted the parties' "First Stipulated Request for Extension of Time to  
8 Comply with August 5, 2021 Order on Mandate" (docket #346), allowing the  
9 parties to file this Joint Status Report by October 12, 2021. On October 8, 2021,  
10 the Court granted the parties' "Second Stipulated Request for Extension of Time to  
11 Comply with August 5, 2021 Order on Mandate" (docket #348). On December 14,  
12 2021, the Court granted the parties' "Third Stipulated Request for Extension of  
13 Time to Comply with August 5, 2021 Order on Mandate" (docket #352).

14 In accordance with the Court's August 5, 2021 Order, the parties have  
15 engaged in good faith, meaningful settlement discussions. The parties have made  
16 substantial progress in settlement negotiations, which has resulted in a proposed  
17 settlement order that defendants have indicated they will sign. Once signed, FTC  
18 counsel will forward the settlement proposal to the FTC's Bureau of Consumer  
19 Protection with the recommendation that it be accepted. If approved by the FTC's  
20 Bureau of Consumer Protection, the proposed settlement will need to be reviewed  
21 and approved by a majority vote of the Federal Trade Commission.

22 Counsel for the parties anticipate that a thirteen-week extension of time will  
23 be sufficient to determine whether the parties can settle this matter or will need to  
24 file briefs on areas of disagreement. The parties thus respectfully request an  
25 extension of time through and including June 7, 2022 for the filing of a status  
26 report on the progress of their settlement negotiations.  
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28

1 Respectfully submitted,

2 Dated: March 7, 2022

3 FEDERAL TRADE COMMISSION  
4 /s/ Faye Chen Barnouw  
5 Faye Chen Barnouw  
6 Maricela Segura  
7 Attorneys for Plaintiff  
8 Federal Trade Commission

Dated: March 7, 2022

HOMER BONNER  
/s/ Peter W. Homer  
Peter W. Homer  
Attorney for Defendants  
Publishers Business Services, Inc.,  
Ed Dantuma Enterprises, Inc.,  
Dirk Dantuma, Dries Dantuma, Jeff  
Dantuma, and Brenda Dantuma Schang

9  
10 IT IS SO ORDERED:

11   
12 HONORABLE ANDREW P. GORDON  
13 UNITED STATES DISTRICT JUDGE

14 DATED: March 8, 2022  
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